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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

AMERICAN INTERNATIONAL SPECIALTY LINES )	
INSURANCE COMPANY, )	
)	
Plaintiff, )	Case No. 05 C 6386
)	
v. )	
)	
NWI-1, INC. (F/K/A FRUIT OF THE LOOM, INC., )	Judge Gottschall
LEPETOMANE II, INC., as Trustee of the Fruit )	Magistrate Judge Mason
of the Loom Successor Liquidation Trust, and )	
LEPETOMANE III, INC., as Trustee of the Fruit )	
of the Loom Custodial Trust )	
)	
Defendants. )	

**FOURTH STIPULATION & ORDER REGARDING  
PENDING DISCOVERY MATTERS**

**STIPULATION**

Plaintiff American International Specialty Lines Insurance Company, Inc., Intervenor-Plaintiff The United States of America, on behalf of the United States Environmental Protection Agency, the United States Nuclear Regulatory Commission, and the National Oceanic and Atmospheric Administration, and Defendants/Counter-Plaintiffs NWI-1, Inc. (f/k/a Fruit of the Loom, Inc.), Lepetomane II, Inc., as Trustee of the Fruit of the Loom Successor Liquidation Trust, and Lepetomane III, Inc., as Trustee of the Fruit of the Loom Custodial Trust, (collectively, the Parties), submit the following stipulations and order for the Court's approval:

1. Over the past several months, the Parties have continued to use their best efforts to finalize a settlement agreement for submission to their principals, and those of various States, for approval.

2. Each party has outstanding discovery obligations, including document productions in response to requests for production, production of privilege logs, responses to notices of inadvertent production, responses to interrogatories, replies to responses to requests for production and/or interrogatories, and other matters. These matters require a significant investment of time and resources to address.

3. On January 26, 2007, the Court extended its January 16, 2007 Order to certain of the Parties to submit a joint discovery plan addressing the Reebie Storage documents through March 9, 2007. On March 7, 2007, the Court extended the deadline set in its January 26, 2007 Order through April 13, 2007. On April 16, 2007, the Court extended the deadline set in its March 7, 2007 Order through May 11, 2007.

4. Negotiation and development of the discovery plan required by the January 16, 2007 Order will take significant time and resources which can otherwise be devoted to efforts to resolve this litigation. The Parties believe that, at this point, their time and resources are best spent attempting to finalize a settlement agreement and believe that it will be possible to do so within a relatively short time.

5. The Parties agree that their mutual discovery obligations should be stayed for a reasonable period pending the outcome of their ongoing settlement negotiations.

6. The Parties respectfully request that the Court approve a further enlargement through and including June 25, 2007 in which to file a discovery plan to address the Reebie Storage documents, with the possibility of a subsequent enlargement if approved by the Court. At such time as the Parties finalize a settlement agreement, they will move the Court to defer all pending discovery obligations indefinitely pending the lodging and approval of settlement documents.

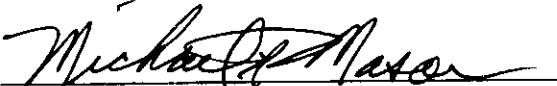
**ORDER**

In view of these stipulations,

**IT IS HEREBY ORDERED THAT:**

The deadline for the parties to submit the proposed discovery plan required by the Court's Orders of January 16, and January 26, March 7, and April 16, 2007 are hereby further extended through June 25, 2007.

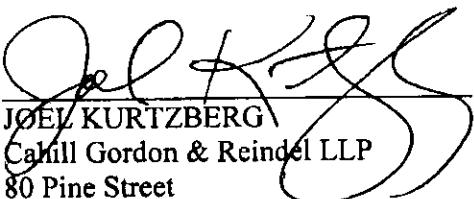
SO ORDERED, this 11 day of May, 2007:

  
**The Honorable Michael T. Mason**  
United States Magistrate Judge

**IT IS STIPULATED:**

For Plaintiff AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, INC.

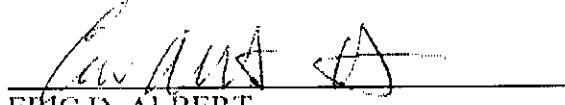
DATE: May 9, 2007

  
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IT IS STIPULATED:

FOR THE UNITED STATES OF AMERICA:

DATE: May 11, 2007

  
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IT IS STIPULATED:

FOR DEFENDANTS/COUNTER-PLAINTIFFS NWI-1, (F/K/A FRUIT OF THE LOOM, INC.), LEPETOMANE II, INC., as Trustee of the Fruit of the Loom Successor Liquidation Trust, and LEPETOMANE III, INC., as Trustee of the Fruit of the Loom Custodial Trust.

DATE: May 10, 2007



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